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October 4, 2023

**VIA ECF**

Hon. Lewis J. Liman  
United States District Judge  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Courtroom 15C  
New York, NY 10007

Re: *Abadi v. American Airlines Inc., et al.*, No.: 1:23-cv-04033 (LJL)

Dear Judge Liman:

We represent defendants American Airlines, Inc., Delta Air Lines, Inc., JetBlue Airways Corp., Southwest Airlines Co., United Airlines, Inc., Roy Goldberg, Robert Land, Debbie Castleton, and Nathalie Sacha (the "Stinson-represented Defendants") in the above-captioned case.

On August 21, 2023, the Court granted Plaintiff's request for leave to proceed *in forma pauperis* and subsequently instructed the Clerk of Court to deliver all documents necessary to effectuate service to the U.S. Marshals Service (*see* Docket Nos. 13, 18). At or near that same time, Plaintiff provided separate waivers of service to each of the Stinson-represented Defendants. Each waiver was timely executed, returned, and then filed by Plaintiff on the Court's docket (*see* Docket Nos. 21-29). As a result, the time to respond to the complaint for each such defendant was set respectively by operation of Federal Rule of Civil Procedure 4(d)(3), and indicated on the docket accordingly. However, in the process of those executed waivers being filed, certain Stinson-represented Defendants are also receiving service of process by the U.S. Marshals. In an abundance of caution, we write to respectfully request that the Court order that the date(s) associated with each duly executed and returned (and filed) waiver constitute(s) the applicable service date(s) for the purposes of computing the applicable response date(s) for the respective Stinson-represented Defendants.

Hon. Lewis J. Liman

October 4, 2023

Page 2

Naturally, by his own filing of the executed waivers, Plaintiff has expressed his consent to this request. We are available at the Court's convenience should it have any questions in this regard.

Respectfully submitted,

/s/ Kieran M. Corcoran

**Stinson LLP**

cc: All counsel of record (via ECF)